1 THE HONORABLE JAMAL WHITEHEAD WITHOUT ORAL ARGUMENT 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 JOSHUA A. DIEMERT, an individual, 10 Plaintiff, No. 2:22-CV-01640-JNW 11 DECLARATION OF VICTORIA SLADE v. IN SUPPORT OF DEFENDANT'S 12 THE CITY OF SEATTLE, a municipal MOTION FOR BILL OF COSTS corporation, 13 Note on Motion Calendar: Defendant. Monday, March 24, 2025 14 15 16 VICTORIA M. SLADE declares as follows: 17 1. I am an attorney at Davis Wright Tremaine LLP, attorneys of record for Defendant The City of Seattle ("Defendant" or "the City). I make the statements in this 18 19 Declaration based on personal knowledge and my review of my law firm's documentation of the 20 costs incurred by Defendant in this case. 21 2. The Court granted Defendant's Motion for Summary Judgment and entered 22 judgment against Plaintiff and in favor of Defendant on all claims in this litigation on February 23 10, 2025. Dkt. Nos. 90 & 91. Defendant now seeks an award of costs pursuant to Federal Rule of Civil Procedure 54(d), LCR 54(d), and other authorities. 24 25 3. Plaintiff deposed ten of Defendant's employees or former employees in this case (i.e. the depositions of aNdi Morales, Brandon Kuykendall, Brian Sharkey (30(b)(6)), Chaney 26 27 Kilpatrick-Goodwill, Gloria Hatcher-Mays, Jason Johnson, Ryan Groce, Shaun Van Eyk, Terry DELCARATION OF VICTORIA SLADE IN SUPPORT OF Davis Wright Tremaine LLP DEFENDANT'S MOTION FOR BILL OF COSTS - 1 LAW OFFICES 920 Fifth Avenue, Suite 3300 (Case 2:22-CV-01640-JNW) Seattle, WA 98104-1610 4901-0745-3722v.2 0002348-000031 206.622.3150 main · 206.757.7700 fax

1	McLellan (30(b)(6)) and Terry McLellan (individually)), and Defendant took the video
2	deposition of Plaintiff in two volumes. Attached as Exhibits 1-8 are copies of the invoices that
3	Defendant paid for the transcripts of eight of these depositions. The total cost of the cited
4	deposition transcript pages was \$2,197.53. Defendant cited to all eight deposition transcripts in
5	its summary judgment briefing. Defendant seeks recovery of these costs under 28 U.S.C.
6	§ 1920(2).
7	4. The parties engaged in document discovery in this case. In order to defend itself
8	fully and respond to Plaintiff's discovery requests, Defendant had to collect, process for review,
9	and produce documents—many of which were in the form of electronically stored information
0	("ESI")—from multiple sources, including Defendant, Plaintiff, and third parties.
11	5. Due to the volume of documents and ESI involved in the case, my firm hired
12	Epiq, a litigation support firm, to assist with document discovery and e-discovery. Attached as
13	Exhibit 9 is a copy of the invoice for charges that Defendant paid to Epiq, which totaled
14	\$16,934.25. These costs related to work that was performed in a Relativity database including
15	reviewing, analyzing and producing documents responsive to discovery requests. Defendant
16	seeks recovery of these costs under 28 U.S.C. § 1920(4).
17	6. I certify that each of the costs requested in this Declaration is correct and was
18	necessarily incurred in this case and that the services for which fees have been charged were
9	actually and necessarily performed.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

Executed this 3rd day of March, 2025 at Seattle, Washington.

<u>/s/ Victoria M. Slade</u> Victoria M. Slade, WSBA #44597

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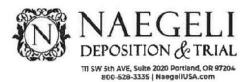
27

CERTIFICATE OF SERVICE

2	I hereby certify that I caused a true and correct copy of the document to which this		
3	Certificate of Service is attached to be served in the manne	er as indicated below:	
4	PACIFIC LEGAL FOUNDATION Attorneys for Plaintiff:	☐ Via Legal Messenger	
5	Wesley P. Hottot, WSBA #47539	☐ Via U.S. Mail, postage prepaid	
6	1425 Broadway, Suite 429 Seattle, WA 98122	☐ Via Federal Express	
7	Telephone: 425.576.0484 whottot@pacificlegal.org	☐ Via Facsimile	
9	Additional Email Address for Service: Brien P. Bartels, Legal Secretary bbartels@pacificlegal.org	☑ Via Electronic Mail, per the Electronic Service Agreement	
10	Laura M. D'Agostino, Virginia Bar #91556	☑ Via CM/ECF	
11	Admitted Pro Hac Vice 3100 Clarendon Boulevard, Suite 1000		
12	Arlington, VA 22201		
13	Telephone: 916.503.9010 ldagostino@pacificlegal.org		
14	Andrew R. Quinio, California Bar #288101		
15	Admitted Pro Hac Vice 555 Capitol Mall, Suite 1290 Sacramento, CA 95814		
16	Telephone: 916.419.7111 aquinio@pacificlegal.org		
17 18	Erin E. Wilcox, California Bar #337427		
19	Admitted Pro Hac Vice 555 Capital Mall, Suite 1290		
20	Sacramento, CA 95814 Telephone: 916.419.7111		
	ewilcox@pacificlegal.org	41 Ct 4 CW 1' 4	
21	Declared under penalty of perjury under the laws of	<u> </u>	
22	DATED at Renton, Washington this 3rd day of Ma	arch, 2025.	
23	/a/Custa Nola		
24	/s/ Greta Nelson Greta Nelson	, Legal Assistant	
25	920 Fifth Avo	GHT TREMAINE LLP enue, Suite 3300	
26	Seattle, WA Telephone: 2		
27	gretanelson@		

DELCARATION OF VICTORIA SLADE IN SUPPORT OF DEFENDANT'S MOTION FOR BILL OF COSTS - 3 (Case 2:22-CV-01640-JNW) 4901-0745-3722v.2 0002348-000031

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax



Darrah N. Hinton Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

T: 206-622-3150 F: 206-757-7700

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
35496	5/2/2024	73957
Job Date	Case	No.
4/15/2024 2:22-CV-01640-JNW		.640-JNW
	Case Name	
Diemert vs. Seattle		
	Payment Terms	
	Due upon receipt	

1 COPY OF TRANSCRIPT OF:

Brian Sharkey 30(B)(6)

Electronic Transcript (E-Tran)

Black/White Exhibits

Color Exhibits

Shipping and Handling

1,847.55

35.00

69.75 122.50

35.00

TOTAL DUE >>>

\$2,109.80

: NDT

Location of Job

: Davis Wright Tremaine LLP

920 5th Avenue, Suite 3300

Seattle, WA 98104

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Seattle, WA 98104

Job No. **BU ID**

Case No. : 2:22-CV-01640-JNW Case Name : Diemert vs. Seattle

Invoice No. : 35496 Invoice Date: 5/2/2024

Total Due : \$2,109.80

PAYMENT W	ITH CREDIT CARD	AMEX MAN
Cardholder's N	lame:	
Card Number:		
Exp. Date:	Phone	#:
Billing Address	1	
Zip:	Card Security Cod	de:
Amount to Cha	arge:	
Cardholder's S	ignature:	
Email:	1	

Remit To: Naegeli Deposition & Trial 111 SW Fifth Avenue

Suite 2020

Portland, OR 97204





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98104-161025

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MAY 0.4 2024
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1325 Fourth Avenue, Suite 1840 Seattle, Washington 98101 206.287.9066

Victoria M. Slade Davis Wright Tremaine LLP 920 Fifth Avenue Suite 3300 Seattle, WA 98104

INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.	
96797	3/25/2024	77143	
Job Date Case No.			
3/22/2024	3/22/2024 2:22-CV-01640-JNW		
Case Name			
Diemert v. The City of Seattle			
Payment Terms			
Due upon receipt			

VIDEOTAPED DEPOSITION OF

Joshua Diemert

Videographer Hourly Appearance 9.00 Hours 1,440.00 Videographer Hourly Appearance - After Hours 1.75 Hours 420.00 Laptop Rental 100.00 1.00 Original Digital Stock 4.00 80.00 Parking 1.00 40.00 TOTAL DUE >>> \$2,080.00

The video was not ordered at the time of the deposition. Please note, our standard video production turnaround time is 5-7 business days, unless ordered on an expedited basis.

We appreciate your business!

Buell is in compliance with WAC 308-14-130(1) in offering court reporting services and fees to all parties on equal terms.

Tax ID: 91-2101641

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Invoice No. : 96797 Invoice Date : 3/25/2024 **Total Due** : \$2,080.00

Remit To: BUELL REALTIME REPORTING, LLC

1325 Fourth Avenue **Suite 1840** Seattle, WA 98101

Job No. : 77143 **BU ID** : VIDEO MAIN Case No. : 2:22-CV-01640-JNW

Case Name : Diemert v. The City of Seattle From: Chrome River Invoices <Invoices@dwt.com>

Sent: Tuesday, March 26, 2024 12:17 PM

To: Chrome River INVOICE

Subject: FW: Buell Realtime Reporting Invoice 96797 - Diemert v. The City of Seattle (witness:

Joshua Diemert) VIDEO

Attachments: Invoice-96797.pdf

From: Kathy Olson

Sent: Tuesday, March 26, 2024 12:16:37 PM (UTC-08:00) Pacific Time (US & Canada)

To: Chrome River Invoices

Subject: Buell Realtime Reporting Invoice 96797 - Diemert v. The City of Seattle (witness: Joshua Diemert) VIDEO

[EXTERNAL]

Buell Realtime Reporting invoice attached.

Please respond to this email if you would prefer to receive your invoices via standard mail. If there is a legal assistant or someone else in your firm you would like us to direct invoices to, provide the contact information, and we will program our system accordingly.

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SEATTLE: 206.287.9066 | TACOMA: 253.235.0111 | NATIONAL: 800.846.6989

BUELL REALTIME REPORTING, LLC

www.buellrealtime.com



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INVOICE

1 of 2

Invoice No.	Invoice Date	Job No.		
99942	6/27/2024	79206		
Job Date Case No.				
6/12/2024 2:22-CV-01640-JNW				
Case Name				
Diemert v. The City of Seattle				
Payment Terms				
Due upon receipt				

ORIGINAL TRANSCRIPT OF:			
Joshua Diemert - Vol. II	315.00	Pages	1,685.25
Attendance Fee	8.50	Hours	722.50
Attendance Fee After Hours	0.25	Hours	31.88
Electronically Certified Transcript: E-Tran and PDF Format	1.00		50.00
Exhibit Processing (Including Production of Original Exhibits)	158.00		140.00
Delivery of Original Transcript	1.00		20.00
	TOTAL DUE	>>>	\$2,649.63

LOCALLY OWNED I CERTIFIED I PERSONAL SERVICE

We appreciate your business!

In an effort to further reduce litigation costs, the original-ordering party may decline a physical sealed original transcript. Your transcript charges will be reduced by 0.40/per page, in addition to any associated delivery fee. If needed at a future date for filing with the court, the physical sealed original transcript may be requested for delivery.

Please notify us prior to the transcript's completion if you would like to decline the physical sealed original transcript.

Once the transcript has been completed, standard turnaround for the physical sealed original transcript is 3-5 business days. As always, expedited delivery will be available if needed sooner.

Tax ID: 91-2101641

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Victoria M. Slade Davis Wright Tremaine LLP 920 Fifth Avenue Suite 3300 Seattle, WA 98104

> Job No. : 79206 BU ID : MAIN

Invoice No.

Total Due

Case No. : 2:22-CV-01640-JNW

: 99942

\$2,649.63

Invoice Date : 6/27/2024

Case Name : Diemert v. The City of Seattle

Remit To: BUELL REALTIME REPORTING, LLC
1325 Fourth Avenue
Suite 1840

Suite 1840 Seattle, WA 98101



1325 Fourth Avenue, Suite 1840 Seattle, Washington 98101 206.287.9066

Victoria M. Slade Davis Wright Tremaine LLP 920 Fifth Avenue Suite 3300 Seattle, WA 98104

INVOICE

2 of 2

Invoice No.	Invoice Date	Job No.		
99942	6/27/2024	79206		
Job Date Case No.				
6/12/2024 2:22-CV-01640-JNW				
Case Name				
Diemert v. The City of Seattle				
Payment Terms				
Due upon receipt				

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Tax ID: 91-2101641

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Remit To: BUELL REALTIME REPORTING, LLC

1325 Fourth Avenue **Suite 1840** Seattle, WA 98101

Invoice No.

Total Due

Job No.

BU ID

: MAIN : 2:22-CV-01640-JNW Case No.

: 79206

: 99942

\$2,649.63

Invoice Date : 6/27/2024

Case Name : Diemert v. The City of Seattle From: Chrome River Invoices <Invoices@dwt.com>

Sent: Monday, July 01, 2024 10:48 AM

To: Chrome River INVOICE

Subject: FW: Buell Realtime Reporting Invoice 99942 - Diemert v. The City of Seattle (witness:

Joshua Diemert - Vol. II)

Attachments: Invoice-99942.pdf

From: Kathy Olson

Sent: Monday, July 1, 2024 10:48:15 AM (UTC-08:00) Pacific Time (US & Canada)

To: Chrome River Invoices

Subject: Buell Realtime Reporting Invoice 99942 - Diemert v. The City of Seattle (witness: Joshua Diemert - Vol. II)

[EXTERNAL]

Buell Realtime Reporting invoice attached.

Please respond to this email if you would prefer to receive your invoices via standard mail. If there is a legal assistant or someone else in your firm you would like us to direct invoices to, provide the contact information, and we will program our system accordingly.

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INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.	
35917	5/6/2024	73959	
Job Date	Case	No.	
4/17/2024	640-JNW		
Case Name			
Diemert vs. Seattle			
Payment Terms			
Due upon receipt			

1 COPY OF TRANSCRIPT OF:

Terry McLellan

Electronic Transcript (E-Tran)

Black/White Exhibits

Shipping and Handling

850.20

35.00

35.25 35.00

TOTAL DUE >>>

\$955.45

Location of Job : Davis Wright Tremaine LLP

920 5th Avenue, Suite 3300

Seattle, WA 98104

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Remit To: Naegeli Deposition & Trial

111 SW Fifth Avenue

Suite 2020

Portland, OR 97204

Job No. : 73959

BU ID

: NDT

Case No.

: 2:22-CV-01640-JNW

Case Name : Diemert vs. Seattle

Invoice No. : 35917

Invoice Date: 5/6/2024

Total Due : \$955.45

PAYMENT W	ITH CREDIT CARD	AMEX	Material	VISA
Cardholder's N	ame:		-	
Card Number:				
Exp. Date:	Phone	#:		100
Billing Address	:			
Zip:	Card Security Cod	de:		
Amount to Cha	irge:			
Cardholder's Si	gnature:			
Email:				





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MAY 09 2023.

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98104-161025

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Victoria M. Slade Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

STATEMENT

1 of 1

Account No.	Date	
C17032	6/17/2024	

1 - 30 days	31 - 60 days	61 - 90 days
\$0.00	\$2,155.35	\$0.00
91 - 120 days	121 days & Over	Total Due
\$0.00	\$0.00	\$2,155.35

Invoice Date	Invoice No.	Balance	Job No.	Job Date	Witness	Case
5/6/2024	35914	2,155.35	73958	4/16/2024	Terry McLellan, 30(B)(6)	Diemert vs. Seattle

Tax ID: 93-1079908

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Victoria M. Slade Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

Remit To: Naegeli Deposition & Trial 111 SW Fifth Avenue Suite 2020 Portland, OR 97204 Account No. : C17032

Date : 6/17/2024

Total Due : \$2,155.35

PAYMENT WI	TH CREDIT CARD XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
Cardholder's Na	ame:
Card Number:	
Exp. Date:	Phone#:
Billing Address:	
Zip:	Card Security Code:
Amount to Cha	rge:
Cardholder's Si	gnature:
Email:	



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INVOICE

1 of 2

Invoice No.	Invoice Date	Job No.
35914	5/6/2024	73958
Job Date	Case	No.
4/16/2024	2:22-CV-01640-JNW	
	Case Name	
Diemert vs. Seattle		
	Payment Terms	
	Due upon receipt	

1 COPY OF TRANSCRIPT OF:	
Terry McLellan, 30(B)(6)	1,051.85
Electronic Transcript (E-Tran)	35.00
Black/White Exhibits	45.00
Color Exhibits	10.50
1 COPY OF TRANSCRIPT OF:	
Terry McLellan, as Individual	855.65
Electronic Transcript (E-Tran)	35.00
Black/White Exhibits	45.00
Color Exhibits	10.50
Shipping and Handling	35.00
TOTAL DUE >>>	\$2,123.50

Location of Job : Davis Wright Tremaine LLP

920 5th Avenue, Suite 3300

Seattle, WA 98104

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Remit To: Naegeli Deposition & Trial 111 SW Fifth Avenue Suite 2020

Portland, OR 97204

Job No. : 73958 BU ID : NDT

Case No. : 2:22-CV-01640-JNW
Case Name : Diemert vs. Seattle

Invoice No. : 35914 Invoice Date : 5/6/2024

Total Due : \$2,155.35

PAYMENT WI	TH CREDIT CARD
Cardholder's N	ame:
Card Number:	
Exp. Date:	Phone#:
Billing Address	
Zip:	Card Security Code:
Amount to Cha	rge:
Cardholder's Si	gnature:
Email:	



INVOICE

2 of 2

Invoice No.	Invoice Date	Job No.
35914	5/6/2024	73958
Job Date	Case	No.
4/16/2024	2:22-CV-01640-JNW	
	Case Name	
Diemert vs. Seattle		
	Payment Terms	
	Due upon receipt	

service.

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(-) Payments/Credits: 0.00 (+) Finance Charges/Debits: 31.85

(=) New Balance: \$2,155.35

PAST DUE

Tax ID: 93-1079908

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Portland, OR 97204

Job No. : 73958 BU ID : NDT

Case No. : 2:22-CV-01640-JNW
Case Name : Diemert vs. Seattle

Invoice No. : 35914 Invoice Date : 5/6/2024

Total Due : \$2,155.35

PAYMENT W	TH CREDIT CARD AMEX E IVST
Cardholder's N	ame:
Card Number:	
Exp. Date:	Phone#:
Billing Address	
Zip:	Card Security Code:
Amount to Cha	rge:
Cardholder's S	gnature:
Email:	



Darrah N. Hinton Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

T: 206-622-3150 F: 206-757-7700

INVOICE

1 of 2

Invoice No.	Invoice Date	Job No.
32721	2/23/2024	72115
Job Date	Case	No.
2/6/2024	2:22-CV-01640-JNW	
	Case Name	
Diemert vs. Seattle		
	Payment Terms	
	Due upon receipt	

1 COPY OF TRANSCRIPT OF:

Brandon Kuykendall

Electronic Transcript (E-Tran) Black/White Exhibits

Color Exhibits

Shipping and Handling

719.10 35.00 62.25 68.25 35.00 \$919.60 TOTAL DUE >>>

Location of Job : Davis Wright Tremaine LLP

920 5th Avenue, Suite 3300

Seattle, WA 98104 THANK YOU FOR YOUR BUSINESS!

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(-) Payments/Credits:

0.00

(+) Finance Charges/Debits:

13.79

Tax ID: 93-1079908

Darrah N. Hinton

Seattle, WA 98104

Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Please detach bottom portion and return with payment.

: 72115 Job No.

BU ID

: 2:22-CV-01640-JNW Case No.

Case Name : Diemert vs. Seattle

Invoice No. : 32721

Invoice Date : 2/23/2024

: NDT

Total Due : \$933.39

Remit To: Naegeli Deposition & Trial 111 SW Fifth Avenue Suite 2020 Portland, OR 97204

PAYMENT W	TH CREDIT CARD AMEX WISA
Cardholder's N	ame:
Card Number:	
Exp. Date:	Phone#:
Billing Address	
Zip:	Card Security Code:
Amount to Cha	rge:
Cardholder's Si	gnature:
Email:	



Darrah N. Hinton Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104 T: 206-622-3150 F: 206-757-7700

INVOICE

2 of 2

Invoice No.	Invoice Date	Job No.
32721	2/23/2024	72115
Job Date	Case	No.
2/6/2024	2:22-CV-01640-JNW	
	Case Name	
Diemert vs. Seattle		
	Payment Terms	
	Due upon receipt	

(=) New Balance:

\$933.39

PAST DUE

Tax ID: 93-1079908

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Remit To: Naegeli Deposition & Trial 111 SW Fifth Avenue **Suite 2020** Portland, OR 97204

: 72115 Job No.

: 2:22-CV-01640-JNW Case No. Case Name : Diemert vs. Seattle

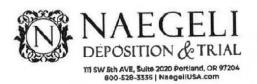
Invoice No. : 32721 Invoice Date: 2/23/2024

BU ID

: NDT

Total Due : \$933.39

PAYMENT WI	TH CREDIT CARD
Cardholder's Na	ame:
Card Number:	
Exp. Date:	Phone#:
Billing Address	
Zip:	Card Security Code:
Amount to Cha	rge:
Cardholder's Si	gnature:
Email:	



INVOICE

1 of 1

521.70

Invoice No.	Invoice Date	Job No.
32720	2/23/2024	72115
Job Date	Case	No.
2/6/2024	2:22-CV-01640-JNW	
	Case Name	N Walle
Diemert vs. Seattle		
	Payment Terms	
	Due upon receipt	

1 COPY OF TRANSCRIPT OF:

Chaney Klipatrick-Goodwill Electronic Transcript (E-Tran) Black/White Exhibits Shipping and Handling

35.00 9.00 35.00 \$600.70 TOTAL DUE >>>

Location of Job : Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

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: 72115 : 2:22-CV-01640-JNW Case No.

Case Name : Diemert vs. Seattle

Invoice No. : 32720

Total Due : \$600.70

Job No.

Invoice Date : 2/23/2024

BU ID

: NDT

Remit To: Naegeli Deposition & Trial 111 SW Fifth Avenue Suite 2020 Portland, OR 97204

	TH CREDIT CARD AMEX VISA
Cardholder's Na	me:
Card Number:	
Exp. Date:	Phone#:
Billing Address	
Zip:	Card Security Code:
Amount to Cha	ge:
Cardholder's Si	gnature:
Email:	

Dieme

Victoria M. Slade Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

98104\$1610 C069

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INVOICE

1 of 2

Invoice No.	Invoice Date	Job No.
33261	2/29/2024	72030
Job Date	Case	No.
2/7/2024	2:22-CV-01	640-JNW
	Case Name	
Diemert vs. Seattle		
	Payment Terms	The second
	Due upon receipt	

1 COPY OF TRANSCRIPT OF:		412.60
Jason Johnson		413,60
Electronic Transcript (E-Tran)		35.00
Black/White Exhibits		6.00
1 COPY OF TRANSCRIPT OF:		1 057 90
Ryan Groce		1,052.80
Electronic Transcript (E-Tran)		35.00
Black/White Exhibits		44.25
Color Exhibits		45.50
Shipping and Handling		35.00
Shipping and mananing	TOTAL DUE >>>	\$1,667.15

Location of Job : Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

THANK YOU FOR YOUR BUSINESS!

For your convenience, Naegeli accepts payment on our website. You can visit our web page, https://www.naegeliusa.com/make-a-payment, to pay by credit card. There is no additional processing fee for this service.

Tax ID: 93-1079908

Please detach bottom portion and return with payment.

Victoria M. Slade Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

Remit To: Naegeli Deposition & Trial

111 SW Fifth Avenue **Suite 2020** Portland, OR 97204

Job No. : 72030 : 2:22-CV-01640-JNW Case No.

Case Name : Diemert vs. Seattle

Invoice No. : 33261

Invoice Date : 2/29/2024

: NDT

Total Due : \$1,667.15

PAYMENT WI	TH CREDIT CARD	AMEX	Material	VISA
Cardholder's N	ame:			
Card Number:				
Exp. Date:	Phone	#:		
Billing Address				
Zip:	Card Security Con	de:		
Amount to Cha	rge:			
Cardholder's Si	gnature:			
Email:				

BU ID



INVOICE

2 of

Invoice No.	Invoice Date	Job No.
33261	2/29/2024	72030
Job Date	Case	No.
2/7/2024	2:22-CV-01	640-JNW
	Case Name	
Diemert vs. Seattle		
	Payment Terms	
	Due upon receipt	

Clients are responsible for a late charge at the rate of 1.5% per month, on an invoice more than 30 days delinquent.

Tax ID: 93-1079908

Please detach bottom portion and return with payment.

Victoria M. Slade Davis Wright Tremaine LLP 920 5th Avenue, Suite 3300 Seattle, WA 98104

Remit To: Naegeli Deposition & Trial

111 SW Fifth Avenue Suite 2020 Portland, OR 97204 Job No. : 72030 B' Case No. : 2:22-CV-01640-JNW

Case Name Diemert vs. Seattle

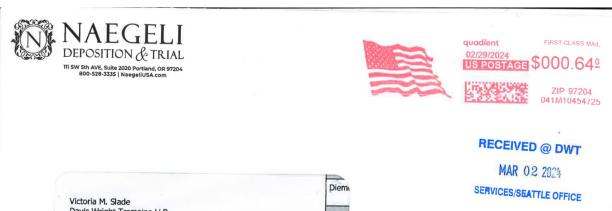
Invoice No. : 33261 Invoice Date : 2/29/2024

Total Due : \$1,667.15

PAYMENT WI	TH CREDIT CARD	AMEX	Material .	VISA
Cardholder's Na	ame:			
Card Number:				
Exp. Date:	Phone	#:		
Billing Address:				
Zip:	Card Security Co.	de:		
Amount to Cha	rge:			
Cardholder's Si	gnature:			
Email:				

BU ID

: NDT



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Page 1 of 3

Epiq eDiscovery Solutions Inc 777 Third Ave, 12th Floor New York, NY 10017

Remit to

Epig eDiscovery Solutions

PO Box 674637

For billing questions, call 913-621-9980 Dallas, TX 75267-4637 or billing@epiqglobal.com

Electronic Payments:

Bank: Wire Routing: ACH Routing: Acct No: SWIFT:

PNC Bank, N.A. 043000096 031207607 8026542429

PNCCUS33

Information

Invoice No. 90855784 Invoice Date 06/08/2024

Purchase Order No.

Customer No. 1001423 Currency USD Contract No. 40073807

Contract Description DWT Diemert v City of Seattle DRS

Terms of Payment Net due in 30 days

Comments

Bill-To

Services from April 22nd 2024 to May 26th 2024

Davis Wright Tremaine LLP Attn: Trevor Pryhorocki

1300 SW Fifth Avenue

Portland OR 97201-5667

Code	Service	Quantity	Unit	Unit Price	Amount
DRS210	First Level Reviewer	162.750	Н	45.0000	7,323.75
DRS310	Review Manager	27.300	Н	135.0000	3,685.50
DRS312	Team Lead	79	Н	75.0000	5,925.00

16,934.25 **Total Amount Due**

Open Items for Contract 40073807 as of 06/10/2024 Trans. Date Reference **Due Date** Curr. **Type** Amount 06/08/2024 90855784 07/08/2024 USD Invoice 16,934.25 16,934.25 USD Total:



Employee	Code	Activity	Date	Hrs D	escription
Edward Perez	DRS210	<u> </u>	04/23/2024	2.75	Regular
Edward Perez	DRS210		04/24/2024	5.50	Regular
Edward Perez	DRS210		04/24/2024	3.25	Regular
Edward Perez	DRS210		04/25/2024	5.25	Regular
Edward Perez	DRS210		04/25/2024	3.75	Regular
Edward Perez	DRS210		04/26/2024	4.25	Regular
Edward Perez	DRS210		04/26/2024	4.00	Regular
Edward Perez	DRS210		04/29/2024	8.25	Regular
Edward Perez	DRS210		04/30/2024	3.00	Regular
Edward Perez	DRS210		04/30/2024	5.25	Regular
Edward Perez	DRS210		05/01/2024	3.50	Regular
Edward Perez	DRS210		05/01/2024	4.50	Regular
Edward Perez	DRS210		05/02/2024	8.50	Regular
Edward Perez	DRS210		05/03/2024	0.50	Regular
Everett Carrell	DRS210		04/23/2024	1.00	Regular
Everett Carrell	DRS210		04/23/2024	5.50	Regular
Everett Carrell	DRS210		04/24/2024	10.00	Regular
Everett Carrell	DRS210		04/25/2024	10.00	Regular
Everett Carrell	DRS210		04/26/2024	10.00	Regular
Everett Carrell	DRS210		04/29/2024	10.00	Regular
Everett Carrell	DRS210		04/30/2024	10.00	Regular
Everett Carrell	DRS210		05/01/2024	10.00	Regular
Everett Carrell	DRS210		05/02/2024	0.50	Regular
Mathew Burge	DRS210		04/23/2024	0.50	Regular
Mathew Burge	DRS210		04/29/2024	8.00	Regular
Mathew Burge	DRS210		04/29/2024	8.00	Regular
Mathew Burge	DRS210		05/01/2024	8.00	Regular
Mathew Burge	DRS210		05/02/2024	3.75	Regular
_	DRS210 DRS210		05/02/2024	5.25	_
Mathew Burge	DK3210		05/05/2024	J.ZJ	Regular
	DRS210			Total 162.75	
	-				
Michael Daniell	DRS310	REV - Project Manager	04/23/2024	3.80	DWT Project Seattle - Review of protocol, workspace updates, fields, choices, etc., communications with team regarding workflow, protocol content, communications with client regarding same, training session.
Michael Daniell	DRS310	REV - Project Manager	04/24/2024	3.00	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individual output, overturns and confirmations, provided feedback and responded to questions, communications with team and TL regarding same.
Michael Daniell	DRS310	REV - Project Manager	04/25/2024	3.00	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individual output, overturns and confirmations, provided feedback and responded to questions, communications with team and TL regarding same.
Michael Daniell	DRS310	REV - Project Manager	04/26/2024	4.00	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individual output, overturns and confirmations, provided feedback and responded to questions, communications with team and TL regarding same.
Michael Daniell	DRS310	REV - Project Manager	04/29/2024	3.00	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individual output, overturns and confirmations, provided feedback and responded to

Employee	Code	Activity	Date	Hrs De	escription
					questions, communications with team and TL regarding same.
Michael Daniell	DRS310	REV - Project Manager	04/30/2024	3.00	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individua output, overturns and confirmations, provided feedback and responded to questions, communications with team and TL regarding same.
Michael Daniell	DRS310	REV - Project Manager	05/01/2024	3.00	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individua output, overturns and confirmations, provided feedback and responded to questions, communications with team and TL regarding same.
Michael Daniell	DRS310	REV - Project Manager	05/02/2024	3.00	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individua output, overturns and confirmations, provided feedback and responded to questions, communications with team and TL regarding same.
Michael Daniell	DRS310	REV - Project Manager	05/03/2024	1.50	DWT Project Seattle - Generated and updated QC/QA workflows, searches, samples, monitored team and individua output, overturns and confirmations, provided feedback and responded to questions, communications with team and TL regarding same.
	DRS310			Total 27.30	
Marah Friesen	DRS312		04/22/2024	0.50	Regular
Marah Friesen	DRS312		04/23/2024	4.00	Regular
/larah Friesen	DRS312		04/24/2024	1.50	Regular
/larah Friesen	DRS312		04/24/2024	8.25	Regular
/larah Friesen	DRS312		04/25/2024	3.00	Regular
/larah Friesen	DRS312		04/25/2024	6.25	Regular
//arah Friesen	DRS312		04/26/2024	4.25	Regular
Marah Friesen	DRS312		04/26/2024	5.75	Regular
//arah Friesen	DRS312		04/29/2024	8.00	Regular
//arah Friesen	DRS312		04/30/2024	2.00	Regular
Marah Friesen	DRS312		04/30/2024	8.00	Regular
Marah Friesen	DRS312		05/01/2024	5.00	Regular
Marah Friesen	DRS312		05/01/2024	6.00	Regular
Marah Friesen	DRS312		05/02/2024	10.00	Regular
	DRS312		05/03/2024	6.50	Regular
Marah Friesen					